

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

RECEIVED

JUN 17 2022

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

EDWARD SMART

Special Administrator of Estate

of Edward SMART, Deceased

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

22cv50211

Judge Philip G. Reinhard  
Magistrate Judge Lisa A. Jensen

vs.

Case No.

(To be supplied by the Clerk of this Court)

D.A.M.C.O.R.E. Investment Group

N.A. as Guardian

S. Attorney at Law

Hevon S. Frost,

Clark, Suster, Zuckh; & Frost, LTD

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:

~~AMENDED COMPLAINT~~

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

\_\_\_\_\_

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

\_\_\_\_\_

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

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**I. Plaintiff(s):**

- A. Name: Edwoud Smart
- B. List all aliases: N/A
- C. Prisoner identification number: N/A
- D. Place of present confinement: N/A
- E. Address: 2069 Aqjali Way Machesney Park IL 61115

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Amcore Investment Group  
 Title: Financial Investment Group  
 Place of Employment: 501 7th Street, Rockford, IL 61104
- B. Defendant: Attorney at Law Kevin S. Frost #4403  
 Title: Attorney at Law  
 Place of Employment: 7320 North Alpine Road IL 61111 <sup>2275</sup>
- C. Defendant: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: None
- B. Approximate date of filing lawsuit: 6/18/2020
- C. List all plaintiffs (if you had co-plaintiffs) including any aliases: Edw. W. Smart, Guardian of Special Administration of the Estate of Edw. W. Smart, deceased.
- D. List all defendants: D. Amcore Investment Group, 2. Law Firm Kevin S. Frost #4403, Clark, Josten, Zucchi, and Frost, Ltd.
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): 400 West State, St. W. Waukegan County 17th Judicial Court.
- F. Name of judge to whom case was assigned: Judge Pinnello  
May 5, 2009 Judgment Order
- G. Basic claim made: Wrongful death, Judgment Order
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Judgment Order, Settlement Agreement  
See Attachment of Order May 5, 2009
- I. Approximate date of disposition: May 5, 2009

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

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**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Plaintiff Edtwaon Smart, as guardian  
of Edward Smart, a minor, and  
Special Administrator of the Estate  
of Edward Smart, Deceased, further  
seek Summary Judgment against  
Amcone Investment Group, failure for  
payment, and uphold Final Judgment Order,  
by 17<sup>th</sup> Judicial Circuit Court Retired  
Judge Honorable Ronald L. Pinello  
see Attachment of Order, plus interest  
for each year's due to ~~Edward~~ Edtwaon Smart  
to all biological children's of Estate  
Rodney Love <sup>S.O.B</sup> 2/22/1961, and Dorack Smart, m.  
S.O.B 11/30/1964.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Edtwon Smart  
 I, Plaintiff, guardian of Estate of Edward Smart  
 now a Adult, son, man seeking rights to  
 Estate of Judgment of deceased Father Edward Smart  
 From: AMCONE Investment Group

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this June day of 17, 2022

Edtwon Smart Edtwon Smart  
 (Signature of plaintiff or plaintiffs)

Edtwon Smart  
 (Print name)

(I.D. Number)

2009 Angali Way Machezney Park IL  
 (Address) 61115



Office of the Secretary of State Jesse White

**ilsos.gov**

## **Corporation/LLC Search/Certificate of Good Standing**

### **Corporation File Detail Report**

File Number 57076429

Entity Name AMCORE INVESTMENT BANKING, INC.

Status  
DISSOLVED

Voluntary Dissolution on Wednesday, 19 April 2000

#### **Entity Information**

Entity Type  
CORPORATION

Type of Corp  
DOMESTIC BCA

Incorporation Date (Domestic)  
Wednesday, 25 November 1992

State  
ILLINOIS

Duration Date  
PERPETUAL

#### **Agent Information**

Name

FRANK P MAGGIO

Address

501 7TH ST STE 501  
ROCKFORD , IL 61104

Change Date

Wednesday, 25 November 1992

## Annual Report

Filing Date

Monday, 15 November 1999

For Year

1999

## Officers

President

Name & Address

JAMES S WARSAW 501 SEVENTH STREET ROCKFORD 61104

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[Reinstate your Dissolved Corporation](#)



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APR 30 2009

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT  
COUNTY OF WINNEBAGO

AMCORE INVESTMENT GROUP, N A , as  
Guardian of EDTWON SMART, a minor, and  
Special Administrator of the Estate of EDWARD  
SMART, Deceased,

Plaintiff,

vs

AMBERWOOD NURSING & REHAB  
CENTER, LLC, an Illinois corporation,

Defendant

No 08 L 241

FILED ON  
Date 5, 5, 09  
*Thomas A. Klein*  
Clerk of the Circuit Court  
By Ry Deputy  
Winnebago County, IL

SCANNED ON 05/05/2009

JUDGMENT ORDER

THIS MATTER coming on for prove-up on the Default Judgment Order entered by this Court on February 12, 2009, the Court having heard the evidence and arguments of the Plaintiff, AMCORE INVESTMENT GROUP, N A , as Guardian of EDTWON SMART, a minor, and Special Administrator of the Estate of EDWARD SMART, Deceased, being fully advised in the premises and having jurisdiction of the subject matter and the parties hereto

IT IS HEREBY ORDERED as follows

1 That Judgment shall be and is hereby entered in favor of the Plaintiff, EDTWON SMART, a minor, and Special Administrator of the Estate of EDWARD SMART, Deceased, and against the Defendant, AMBERWOOD NURSING & REHAB CENTER, LLC, an Illinois corporation, in the total amount of \$853,495 70, plus costs, itemized as follows

a, As to Count I – Illinois Wrongful Death Act \$500,000 00,

SCANNED ON @ 05/05/2009

- b As to Count II – Illinois Nursing Home Care Act \$250,000 00
- c Count III – Illinois Family Expense Statute - \$3,495 70
- d Count IV – Illinois Survival Statute - \$100,000 00

Dated this 5 day of May, 2009

ENTER

[Signature]  
Judge Pirrello

Prepared by

[Signature]  
Kevin J Frost, # 4403  
Clark, Justen, Zucchi & Frost, Ltd  
7320 N Alpine Rd  
Rockford, IL 61111



I hereby certify that this document is a true, perfect and complete copy of the original on file in my office.

[Signature]  
Clerk of the Circuit Court  
Winnebago County, Illinois

By [Signature]

Deputy Clerk

Date 6-16-22